Form ACF-202 – TANF Caseload Reduction Report
State: Tennessee Fisca Fiscal Year 2005

Stat	e: Tennessee		Fiscal Year 2004
	Part I – Implementation of All Eligibility Chan	ges Made by the St	ate Since FY 1995
#	Eligibility Change	Implementation	Estimated impact on
		Date	Caseload Since Change
			(positive or negative impact)
Cha	inges required by Federal Law		Average Monthly Impact
1	Parents who are non-exempt from the work requirement	September 1,	-308
	must commit to 40-hours per week of work and/or work	1996	
	related activities.		
2	Teen parents must live in adult supervised settings to	September 1,	-6
	receive assistance, unless there is good cause	1996	
3	A person found to have fraudulently misrepresented	September 1,	No Impact
	residence in order to obtain assistance in more than one	1996.	
	State is denied assistance for 10 years		
4	Fugitive felons, probation violators, or parole violators	October 1, 1996	No Impact
	are denied assistance		
5	Individuals who are convicted of a drug-related felony	July 1, 1997	No Impact
	after August 22, 1996 are denied assistance		

Stat	e Implemented Changes		Average Monthly Impact
Cha	nges Related to Income and Resources		
1	Annual Increase of the Consolidated Need Standard	\$583FY96	+10060
	from \$500 in FY95 (example is for a family of three) to	\$677FY97	
	\$880 July 1, 2004.	\$773FY99	
		\$799FY00	
		\$840FY01	
		\$830—FY02	
		\$859FY03	
		\$880FY04	
		\$880FY05	
2	Vehicle Limit was raised from \$1,500 to \$4,600 equity	September 1,	+39
	value	1996	
3	Resource limit was increased from \$1000 to \$2000	September 1,	+233
		1996	
4	For twelve counties, Individual Development Accounts	July 1, 1997	No Impact
	are available with the first \$5,000 disregarded from the		
	resource limit		
5	Earned income disregard changed from \$90 plus 30 and	September 1,	No Impact
	one third to a flat \$150 earned income disregard	1996	
6	Business owners on assistance will have their profits	September 1,	No Impact
	disregarded if placed in escrow with a low-income	1996	
	entrepreneurial escrow account September 1, 1996		

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Cha	nges Related to Categorical or Demographic Eligibility Factor	ors	Average Monthly Impact
1	For those who marry while receiving assistance and whose new spouse's income is below 185% of the CNS, the 100-hour rule is waived and the deprivation requirement is removed. The assistance group can choose whether or not he/she would like to be included or excluded from the	September 1, 1996	+162
2	Enumeration sanction – Prior to 9/1/96, if an individual who was required to be included in the AFDC assistance group refused to provide or apply for an SSN, the entire AG was ineligible for AFDC. If the mandatory AG member failed to provide or apply for an SSN, only that individual was technically ineligible and was removed from the AG. Under Families First policy, if an individual who is	September 1, 1996	No Impact
	required to be included in the Families First AG refuses or fails to provide or apply for an SSN, only that individual is removed from the assistance group as technically ineligible, rather than the entire AG becoming ineligible.		
	nges related to Behavioral Requirements:		Average Monthly Impact
1	As a condition of eligibility, all assistance groups must sign a Personal Responsibility Plan that details what is expected of the recipient: including immunizations for the children; regular health checks; school attendance; cooperation with child support; and, unless exempt, the work plan	September 1, 1996	-15
Cha	nges due to Full Family Sanctions		Average Monthly Impact
1	Recipients are sanctioned for failure to comply with their work requirement found in their PRP. The first occurrence of non-compliance results in case closure until compliance. The second and subsequent sanctions must last for three months and until compliance	September 1, 1996	-3097
2	A recipient is sanctioned for failure to cooperate with child support. This sanction lasts until compliance.	September 1, 1996	-140
3	A case is denied or closed if a customer has voluntarily quit a job without good cause in the three months before an application is filed (this includes the month of application). After three months have passed from the quit date, the participant may receive assistance again, provided that all other eligibility criteria are met.	September 1, 1996.	-117
4	Recipients who reapply and do not cure a sanction for failure to comply with their work requirement found in their PRP are denied. First sanctions last until compliance. The second and subsequent sanctions must last for three months and until compliance.	September 1, 1996	-735

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Oth	er Eligibility Changes		Average Monthly Impact
1	There is an 18-month period of eligibility time limit for all non-exempt assistance groups. This is an 18-month time period that starts the month after the initial PRP sign date. The 18-month count applies to months on assistance, whether or not the months of assistance are received consecutively or not. These time limits can be interrupted or exempted depending on the assistance group circumstances.	Time Limit first reached April 1, 1998	-962
2	There is a 60-month lifetime time limit for all non-exempt assistance groups. This is the first year any cases have reached this time limit in Tennessee. The 60-month count applies to months on assistance, whether or not the months of assistance are received consecutively or not. These time limits can be interrupted or exempted depending on the assistance group circumstances.	Time Limit first reached Sept. 30, 2001	No Impact
3	For those aliens made ineligible by PRWORA, service continues with state only funds under old AFDC rules. This data is tracked monthly, giving a total of aid groups still receiving assistance.	September 1, 1996	+391
	Estimated Total Net Impact on the Caseload of All Eligibi	lity Changes	+5505
	Total Prior Year Caseload		73464
	Estimated Caseload Reduction Credit		34.7%

State: Tennessee Fiscal Year 2005

State of Tennessee			Fiscal	Year 2004
Part II – Applica	tion Denials By	Reason		
	FY	95]	FY03
Reason for Application Denials	Number*	Percentage	Number	Percentage
No eligible child	436	0.2%	114	0.2%
Not deprived of support	63,492	42.5%	2916	4.2%
Resources exceed limits	11,396	7.6%	465	0.7%
Income exceeds standards	61,424	41.1%	11548	16.8%
Failure to comply with procedural requirements	1,832	1.2%	2493	3.6%
Undocumented alien	4	0.0%	1	0.0%
Non-resident	192	0.1%	114	0.2%
Application Withdrawn			43942	63.8%
Unable to Locate or Moved			17	0.0%
Continued work sanction status			2335	3.4%
Voluntary quit			329	0.5%
Failed to sign PRP			65	0.1%
Non-cooperation with child support			210	0.3%
Other	10,536	7.0%	4375	6.3%
TOTAL APPLICATION DENIALS	149,312		68924	100.0%

^{*} Totals include multiple denials in the same month

State Tennessee			Fiscal	Year 2004
Reasons for	Case Closures by	Reason		
	F	Y95		FY04
	Number *	Percentage	Number *	Percentage
No longer eligible child	1,480	1.7%		
Child too old for assistance			314	0.67%
Child absent from home			0	0.00%

State: Tennessee Fiscal Year 2005

No longer deprived of support or care	1,328	1.6%		
Resources exceed limits	608	0.7%	63	0.13%
Income Exceeds requirements	5,616	6.6%		
Employment			12624	26.85%
Child Support Collections			1	0.00%
Excess Unearned Income			218	0.46%
Moved or cannot locate	25,264	29.6%		
Recipient initiative	7,960	9.3%	1351	2.87%
Failure to Appear, Submit or Cooperate	20,268	23.7%	1329	2.83%
Failure to comply with Work Requirement (for FY95,	56	0.06%		
JOBS Req.)				
Work related Sanctions			8321	17.70%
Teen Parent failing Attendance Req.			12	0.03%
Failure to cooperate with Child Support			195	0.41%
Teen Parent not living w/ Adult			0	0.00%
Failed to Sign PRP			1	0.00%
Time Limits			1634	3.48%
Transfer to State or TANF Program			63	0.13%
Other	22,756	26.7%	20894	44.44%
TOTAL CASE CLOSURES	85,336		47021	100.00%

^{*} Totals include multiple closures in the month

State: Tennessee Fiscal Year 2005

State Tennessee Fiscal Year 2004

Part III – Description of the Methodology Used to Calculate the Caseload Reduction Estimates (attached supporting data to this form)

Changes Required by Federal Law

<u>1 – Parents who are not exempt from the work requirement must commit to 40-hours per week of work and/or work related activities – September 1, 1996</u>

The impact of this eligibility change is shown in our denial and closure figures. As the Denial figures are represented on page nine, this chart will account for closures only. We have counted the number monthly that refuse to sign the PRP. For residual effect, we refer to University of Memphis, March 1998 study, *Summary of Surveys of Welfare Recipients Employed or Sanctioned for Non-Compliance,* which surveyed those who refused to sign the Personal Responsibility Plan. In the study, 70% expressed their plans to go to work and not return to the Families First (TANF) Program. So, for the first month of closure due to failure to sign the PRP, we will count only 30%. For continued residual months we refer to the Center for Business and Economic Research 2001 study, *An Examination of Time Limits in Tennessee*, which states that for non-exempt cases the majority leave Families First by the sixth month. Therefore, we will count 6 months at 30% of the initial closure figure. We feel this will overstate the number that would have remained eligible, as those refusing to sign the PRP are not all likely to have been eligible at application.

Closure	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
month													
Residual	239	211	180	143	109	58							939
Impact													
Oct-03	173	52	52	52	52	52	52						484
Nov-03		120	36	36	36	36	36	36					336
Dec-03			116	35	35	35	35	35	35				325
Jan-04				67	27	27	27	27	27	27			229
Feb-04					100	30	30	30	30	30	30		280
Mar-04						99	30	30	30	30	30	30	277
Apr-04							65	20	20	20	20	20	163
May-04								75	23	23	23	23	165
Jun-04									79	24	24	24	150
Jul-04										94	28	28	150
Aug-04											95	29	124
Sep-04												74	74
Total	412	383	384	332	359	336	274	252	243	246	249	226	3696

Average Monthly Impact

State: Tennessee Fiscal Year 2005

2 – Teen parents must live in adult supervised settings to receive assistance, unless there is good cause – September 1, 1996

Based on the Families First 2003 Case Characteristics study, the average age of a minor caretaker receiving Families First is 16.5 years. Therefore, we will track closures based on a teen parent not in an adult supervised setting for 20 months.

Closure month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
Residual Impact	5	5	5	5	5	5	5	5	5	4	3	2	54
Oct-03	1	1	1	1	1	1	1	1	1	1	1	1	12
Nov-03		0											0
Dec-03			0										0
Jan-04				0									0
Feb-04					0								0
Mar-04						0							0
Apr-04							0						0
May-04								0					0
Jun-04									0				0
Jul-04										0			0
Aug-04											0		0
Sep-04												0	0
Total	6	6	6	6	6	6	6	6	6	5	4	3	66

Average Monthly Impact

6

<u>3 – A person found to have fraudulently misrepresented residence in order to obtain assistance in more than one State is denied assistance for 10 years. – September 1, 1996</u>

No impact is estimated for this provision because it disqualifies the individual rather than the case.

4 – Fugitive felons, probation violators, or parole violators are denied assistance – October 1, 1996

No impact is estimated for this provision because it disqualifies the individual rather than the case.

<u>5 – Individuals who are convicted of a drug-related felony after August 22, 1996 are denied assistance – October 1, 1996</u>

No impact is estimated for this provision because it disqualifies the individual rather than the case.

State: Tennessee Fiscal Year 2005

State Implemented Changes

Changes related to Income and Resources

1- Increase in the Consolidated Need Standard

To determine the impact of increases in the Consolidated Need Standard as compared to Fiscal Year 1995's level, TDHS compared the net income of each assistance group to the need standard in FY95. This data is now collected monthly to identify assistance groups that stayed in the caseload each month with income that would have been ineligible in FY95. Because the data below was run for each month, the data incorporates the residual effect of the eligibility expansion.

Closure month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
# open	9687	9861	9531	10259	10158	10148	10066	10151	10296	10165	10235	10163	120720

Average Monthly Impact

10060

2 - Vehicle Limit was raised from \$1,500 to \$4,600 equity value - September 1, 1996

This information is tracked monthly; the residual effect is included. To determine the impact of this change, we track cases with vehicles having equity value between \$1,500 and \$4,600.

Closure	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
month													
# open	44	43	37	40	40	36	36	38	37	35	38	39	463

Average Monthly Impact 3

3 - Resource limit was increased from \$1000 to \$2000 - September 1, 1996

This information is tracked monthly; the residual effect is included. To determine the impact of this change, we track cases with resources between \$1,000 and \$2,000.

Closure month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
# open	234	231	226	221	222	226	239	243	245	250	224	237	2798

Average Monthly Impact

233

4 - For twelve counties, Individual Development Accounts are available with the first \$5,000 disregarded from the resource limit – July 1, 1997

We do not expect an impact in the future as funding has been discontinued. IDA accounts started before the removal of funding remain open and the disregards in place.

State: Tennessee Fiscal Year 2005

5 - Earned income disregard changed from \$90 plus 30 and one third to a flat \$150 earned income disregard - September 1, 1996

While this can be a less generous income disregard during the first four months of employment because the thirty dollars and one third disregard is not available to the recipient, TDHS believes that the increased generosity of the flat earnings disregard after the fourth month counteracts the initial effect of the removal of the thirty and a third. In addition, the new flat disregard is sometimes a higher disregard than the thirty and a third. The positive effect of the new flat disregard is #1, page 7, of this section, Increase in the Consolidated Need Standard.

<u>6</u> - Business owners on assistance will have their profits disregarded if placed in escrow with a lowincome entrepreneurial escrow account. – September 1, 1996

No impact.

Changes Related to Categorical or Demographic Eligibility Factors

1. For those who marry while receiving assistance and whose new spouse's income is below 185% of the CNS, the 100-hour rule is waived and the deprivation requirement is removed. The assistance group can choose whether or not he/she would like to be included or excluded from the grant. – September 1, 1996

This data is collected on a monthly basis. As it is collected monthly, the data incorporates the residual effect of the eligibility expansion.

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
# remaining in FF	169	167	167	171	168	161	157	157	157	158	161	153	1946

Average Monthly Impact 162

2 - Enumeration sanction – an individual who is required to be included in the Families First AG refused or fails to provide or apply for an SSN, only that individual is removed from the assistance group as technically ineligible, rather than the entire AG becoming ineligible. September 1, 1996

No impact is estimated for this provision because it disqualifies the individual rather than the case.

State: Tennessee Fiscal Year 2005

Changes Related to Behavioral Requirements:

1 - As a condition of eligibility, all assistance groups must sign a Personal Responsibility Plan that details what is expected of the recipient: including immunizations for the children; regular health checks; school attendance; cooperation with child support; and, unless exempt, the work plan – September 1, 1996

The impact of this eligibility change is shown in our denial figures, as opposed to the chart on page 5, which refers to closure figures. We have counted the number monthly that refuse to sign the PRP. For residual effect, we refer to University of Memphis, March 1998 study, *Summary of Surveys of Welfare Recipients Employed or Sanctioned for Non-Compliance*, which surveyed those who refused to sign the Personal Responsibility Plan. In the study, 70% expressed their plans to go to work and not return to the Families First (TANF) Program. So, for the first month of denial due to failure to sign the PRP, we will count only 30%. For continued residual months we refer to the Center for Business and Economic Research 2001 study, *An Examination of Time Limits in Tennessee*, which states that for non-exempt cases the majority leave Families First by the sixth month. Therefore, we will count 6 months at 30% of the initial denial figure. We feel this will overstate the number that would have remained eligible, as those refusing to sign the PRP are not all likely to have been eligible at application.

Denial month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Tot
Residual Impact	8	6	6	4	2	1							28
Oct-03	6	2	2	2	2	2	2						17
Nov-03		4	1	1	1	1	1	1					11
Dec-03			8	2	2	2	2	2	2				22
Jan-04				7	2	2	2	2	2	2			20
Feb-04					9	3	3	3	3	3	3		25
Mar-04						6	2	2	2	2	2	2	17
Apr-04							5	2	2	2	2	2	13
May-04								2	1	1	1	1	4
Jun-04									3	1	1	1	6
Jul-04										3	1	1	5
Aug-04											3	1	4
Sep-04												9	9
Total	14	12	17	16	19	17	17	14	14	13	11	16	180

State: Tennessee Fiscal Year 2005

Changes due to Full Family Sanctions

1. A recipient is sanctioned for failure to comply with their work requirement found in their PRP. The first occurrence of non-compliance results in case closure until compliance. The second and subsequent sanctions must last for three months and until compliance. – September 1, 1996

In counting the monthly impact for this change, we have made estimates based on the differences between the first and subsequent sanction. We do not have the capability to distinguish between a first and a second sanction at this time. When we have the capability to distinguish between a first and a second sanction, we will make the following estimates. A first sanction will be tracked in this report for two months. We feel this is ample time because many of those who are first sanctioned show compliance quickly and do not lose any benefits. However, some are slower to return to the program, therefore we think the 2 months captures the middle ground for both scenarios. In addition, for those sanctioned for a second or subsequent sanction, we will follow those sanctions for the three months of ineligibility plus one month to address the need to show compliance before becoming eligible again. Four months includes the minimum of three months of ineligibility with one month added to address those who may not return to the program the first month after the sanction ends. Until we have the capability to track first and second sanctions separately, we will count each sanction as lasting four months, therefore overstating the impact.

Closure month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Tot
Residual Impact	1455	1017	549										3021
Oct-03	627	627	627	627									2508
Nov-03		533	533	533	533								2132
Dec-03			1026	1026	1026	1026							4104
Jan-04				733	733	733	733						2932
Feb-04					816	816	816	816					3264
Mar-04						1042	1042	1042	1042				4168
Apr-04							894	894	894	894			3576
May-04								979	424	424	424		2251
Jun-04									983	983	983	983	3932
Jul-04										956	956	956	2868
Aug-04											848	848	1696
Sep-04												712	712
Total	2082	2177	2735	2919	3108	3617	3485	3731	3343	3257	3211	3499	37164

State: Tennessee Fiscal Year 2005

2. A recipient is sanctioned for failure to cooperate with child support. This sanction lasts until compliance. – September 1, 1996

We have counted each child support sanction for each month using the rationale described above for the work-related sanctions. (This includes both denials and closures for failure to cooperate with child support.) For the residual effect of the sanction, we have estimated that the average length of time the child support sanction status will remain in place is two months. Therefore, each child support sanction is tracked for two months after it occurs.

Closure month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Tot
Residual Impact	47												47
Oct-03	36	36											72
Nov-03		41	41										82
Dec-03			51	51									102
Jan-04				15	15								30
Feb-04					30	30							60
Mar-04						35	35						70
Apr-04							19	19					38
May-04								46	46				92
Jun-04									160	160			320
Jul-04										116	116		232
Aug-04											193	193	386
Sep-04												144	144
Total	83	77	92	66	45	65	54	65	206	276	309	337	1675

Average Monthly Impact

State: Tennessee Fiscal Year 2005

3. A case is closed or denied if a customer has voluntarily quit a job without good cause in the three months before an application is filed (this includes the month of application). After three months have passed from the quit date, the participant may receive assistance again, provided that all other eligibility criteria are met. – September 1, 1996.

Because the voluntary quit provisions make an assistance group ineligible for three months, we will track voluntary quit sanctions and denials for three months. This, in fact, will overstate the residual effect of this policy since many applicants quit their jobs prior to application making the time effect of this policy less than the full three months.

Closure or Denial month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Tot
Residual Impact	95	46											141
Oct-03	26	26	26										78
Nov-03		30	30	30									90
Dec-03			33	33	33								99
Jan-04				34	34	34							102
Feb-04					33	33	33						99
Mar-04						49	49	49					147
Apr-04							31	31	31				93
May-04								40	40	40			120
Jun-04									51	51	51		153
Jul-04										43	43	43	129
Aug-04											52	52	104
Sep-04												54	54
Total	121	102	89	97	100	116	113	120	122	134	146	149	1409

State: Tennessee Fiscal Year 2005

4. Recipients, who do not cure a sanction for failure to comply with their work requirement found in their PRP, are denied. First sanctions last until compliance. The second and subsequent sanctions must last for three months and until compliance.--September 1, 1996.

In counting the monthly impact for this change, we have made estimates based on the differences between the first and subsequent sanction. We do not have the capability to distinguish between a first and a second sanction at this time. When we have the capability to distinguish between a first and a second sanction, we will make the following estimates. A first sanction will be tracked in this report for two months. We feel this is ample time because many of those who are first sanctioned show compliance quickly and do not lose any benefits. However, some are slower to return to the program, therefore we think the 2 months captures the middle ground for both scenarios. In addition, for those sanctioned for a second or subsequent sanction, we will follow those sanctions for the three months of ineligibility plus one month to address the need to show compliance before becoming eligible again. Four months includes the minimum of three months of ineligibility with one month added to address those who may not return to the program the first month after the sanction ends. Until we have the capability to track first and second sanctions separately, we will count each sanction as lasting four months, therefore overstating the impact.

Denial month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
Residual Impact	424	298	173										895
Oct-03	142	142	142	142									568
Nov-03		125	125	125	125								500
Dec-03			218	218	218	218							872
Jan-04				170	170	170	170						680
Feb-04					189	189	189	189					756
Mar-04						209	209	209	209				836
Apr-04							178	178	178	178			712
May-04								171	171	171	171		684
Jun-04									266	266	266	266	1064
Jul-04										190	190	190	570
Aug-04											210	210	420
Sep-04												267	267
Total	566	565	658	655	702	786	746	747	824	805	837	933	8824

State: Tennessee Fiscal Year 2005

Other Eligibility Changes

1. There is an 18-month period of eligibility time limit for all non-exempt assistance groups. This is an 18-month time period that starts the month after the initial PRP sign date. The 18-month count applies to months on assistance, whether or not the months of assistance are received consecutively or not. These time limits can be interrupted or exempted depending on the assistance group circumstances. – Time limits first reach April 1, 1998

For those reaching the 18-month period of eligibility time limit, there is a three-month period of ineligibility. After that time, the participant can reapply with the standard eligibility criteria. For this reason, we will only be tracking the residual effect of this provision for three months after the time of case closure due to time limits. This will slightly overstate the effect of this provision to the extent those who reach the time limit qualify for early re-entry or become exempt from the time limits, therefore not having to wait for the full three-month period of ineligibility.

Closure month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Tot
Residual Impact	336	191											527
Oct-03	174	174	174										522
Nov-03		146	146	146									438
Dec-03			166	166	166								498
Jan-04				137	137	137							411
Feb-04					368	368	368						1104
Mar-04						465	465	465					1395
Apr-04							444	444	444				1332
May-04								453	453	453			1359
Jun-04									519	519	519		1557
Jul-04										416	416	416	1248
Aug-04											467	145	612
Sep-04												539	539
Total	510	511	486	449	671	970	1277	1362	1416	1388	1402	1100	11542

Average Monthly Impact

State: Tennessee Fiscal Year 2005

2. There is a 60-month lifetime time limit for all non-exempt assistance groups.

Federal Fiscal Year 2003 saw Tennessee's first cases closed for the 60 month Time Limit. Based on the Families First 2003 Case Characteristics study, the average stay on Families First is 33 months. Since the 60 month Time Limit exceeds the average stay, there is no residual effect to track.

Closure month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
Cases	0	0	0	0	1	0	0	0	0	0	0	1	2
closed													

Average Monthly Impact

0

3. For those aliens made ineligible by PRWORA, service continues with state only funds under old AFDC rules. This data is tracked monthly, giving a total of aid groups still receiving assistance. As the information is gathered monthly, the residual effect is reflected in the totals.

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
# remaining in FF	368	370	376	391	386	380	388	396	400	408	409	424	4696

Average monthly Impact